

EXHIBIT
D**Civil Affidavit Candi Taggart.pdf**

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E-Signature Summary**E-Signature 1: Carolyn Ann Taggart (CAT)**

February 10, 2021 06:12:54 -8:00 [F78B89CBE319] [184.54.114.235]
ctaggart@porterwright.com (Principal) (ID Verified)

E-Signature Notary: Suzie Armbruster (suz)

February 10, 2021 06:12:54 -8:00 [B712A2CC278A] [71.67.225.202]
Suzie@rittgers.com

I, Suzie Armbruster, did witness the participants named above electronically sign this document.



AFFIDAVIT

State of Ohio)

) SS:

_____ County)

Carolyn A. Taggart, being first duly cautioned and sworn, deposes and says:

1. I have been a licensed and practicing attorney for 42 years with Bar admissions to Ohio, Kentucky, the United States Court of Appeals for the Sixth Circuit, the United States District Court for the Northern District of Ohio, the United States District Court for the Southern District of Ohio, the United States District Court for the Western District of Kentucky, the United States District Court for the Eastern District of Kentucky, and the United States Supreme Court .
2. I am a past president of the Ohio Association of Civil Trial Attorneys and have been a faculty member for the National Institute of Trial Advocacy at the University of Cincinnati College of Law. I have also been a fellow in the American College of Trial Lawyers since 2000.
3. My area of practice has been civil litigation and I have tried many jury trials to conclusion.
4. As a civil trial attorney, I find the timely disclosure of evidence or information through the Civil Rules of Procedure impacts so many facets of a case other than just the trial itself. Timely disclosure of information impacts what pretrial motions are filed, what experts need to be retained, what witnesses need to be interviewed, what documents will be necessary for trial and/or pretrial motions, and other strategic matters ranging from voir dire and opening statement to motions *in limine*.
5. In my experience, several months of preparation and work may be required after initial discovery is provided. Even if not admissible, a single piece of discovery can be the building block that leads to further significant and material admissible evidence so long as counsel has ample time to inquire and prepare.
6. Based on my civil trial experience, I believe that timely disclosure of crucial pieces of evidence and information is the only way to adequately prepare for a trial on the full merits of a case and also helps to promote judicial economy by permitting both parties to be well prepared and ready to try their case.
7. Fundamental fairness would seem to require timely disclosure when someone's life or liberty is at stake.

Further affiant sayeth naught.

Carolyn A. Taggart



Sworn to before me and subscribed in my presence this 10th day of February, 2021.

02/10/2021

Suzie Armbruster

Signed on 20210210 06:12:54 -8:00

Notary Public

